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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

v.

ROBERT EDWARD DZIEZYNSKI,

Defendant.

Case No:

63 SGJ 98

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES
AND ARTIFICES**, a Class 2 Felony, in
violation of A.R.S. § 13-2310;

COUNT 2: THEFT, a Class 2 Felony, in
violation of A.R.S. § 13-1802;

COUNT 3: THEFT, a Class 3 Felony, in
violation of A.R.S. § 13-1802;

**COUNTS 4 through 6: ACQUISITION
OF NARCOTIC DRUGS BY FRAUD**,
Class 3 Felonies, in violation of A.R.S. § 13-
3408.A.6;

**COUNT 7: IMPERSONATING A PEACE
OFFICER**, a Class 4 Felony, in violation of
A.R.S. § 13-2411;

COUNTS 8 through 15: FORGERY, Class
4 Felonies, in violation of A.R.S. § 13-2002.

The Arizona State Grand Jury accuses ROBERT EDWARD DZIEZYNSKI, charging on this 12th day of August, 2008 that in or from Maricopa County, Arizona:

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES

Between August 3, 2007 and June 11, 2008, Defendant, ROBERT EDWARD DZIEZYNSKI, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit from BLUE CROSS BLUE SHIELD OF ARIZONA, WALGREEN'S and CITIBANK MASTERCARD by means of fraudulent pretenses, representations, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-701, 13-702, 13-702.01, 13-702.02 and 13-801, a class 2 felony.

COUNT 2: THEFT

Between August 3, 2007 and November 8, 2007, Defendant, ROBERT EDWARD DZIEZYNSKI, without lawful authority, knowingly obtained by means of material representation the services or property of BLUE CROSS/BLUE SHIELD OF ARIZONA, to wit: cash, of a value of \$25,000 or more with the intent to deprive BLUE CROSS/BLUE SHIELD OF ARIZONA of such property or services, in violation of A.R.S. §§ 13-1802(A)(3), 13-1801, 13-701, 13-702, 13-702.01, 13-702.02 and 13-801, a class 2 felony.

COUNT 3: THEFT

Between November 23, 2007 and December 26, 2007 Defendant, ROBERT EDWARD DZIEZYNSKI, without lawful authority, knowingly obtained, by means of a material

representation, the property or services of BLUE CROSS/BLUE SHIELD OF ARIZONA and CITIBANK MASTERCARD, to wit: cash, of a value of \$4,000 or more but less than \$25,000, with the intent to deprive BLUE CROSS/BLUE SHIELD OF ARIZONA and CITIBANK MASTERCARD of such property or services, in violation of A.R.S. §§ 13-1802(A)(3), 13-1801, 13-701, 13-702, 13-702.01, 13-702.02 and 13-801, a class 3 felony.

COUNT 4: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

Between December 5, 2007 and December 6, 2007 Defendant, ROBERT EDWARD DZIEZYNSKI, knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-3418, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 5: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

On or about December 20, 2007 Defendant, ROBERT EDWARD DZIEZYNSKI, knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-3418, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 6: ACQUISITION OF NARCOTIC DRUGS BY FRAUD

On or about June 11, 2008, Defendant, ROBERT EDWARD DZIEZYNSKI, knowingly obtained Actiq/Fentanyl, a narcotic drug by fraud, deceit, misrepresentation, or subterfuge, in violation of A.R.S. § 13-3401, 13-3408, 13-3418, 13-701, 13-702, and 13-801, a class 3 felony.

COUNT 7: IMPERSONATING A PEACE OFFICER

Between August 9, 2007 and December 14, 2007, during the commission of a THEFT, Defendant, ROBERT EDWARD DZIEZYNSKI, without lawful authority, pretended to be a peace officer and engaged in conduct with the intention to induce AMANDA SCHLICHTING, the EMPLOYEES OF THE APOTHECARY PHARMACY and EMPLOYEES OF WALGREEN'S PHARMACY to rely upon the Defendant's pretended authority or acts, in violation of A.R.S. § 13-2411, 13-1801, 13-1802, 13-701, 13-702, and 13-801, a class 4 felony.

COUNT 8: FORGERY

On or about August 13, 2007, Defendant, ROBERT EDWARD DZIEZYNSKI, with intent to defraud, offered or presented to the APOTHECARY SHOP PHARMACY a prescription for ACTIQ/FENTANYL in the name of ROBERT DZIEZYNSKI, a forged instrument or one which contained false information, in violation of A.R.S. § 13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801, a class 4 felony.

COUNT 9: FORGERY

On or about August 23, 2007, Defendant, ROBERT EDWARD DZIEZYNSKI, with intent to defraud, offered or presented to the APOTHECARY SHOP PHARMACY a prescription for ACTIQ/FENTANYL in the name of ROBERT DZIEZYNSKI, a forged instrument or one which contained false information, in violation of A.R.S. § 13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801, a class 4 felony.

COUNT 10: FORGERY

On or about September 13, 2007, Defendant, ROBERT EDWARD DZIEZYNSKI, with intent to defraud, offered or presented to the APOTHECARY SHOP PHARMACY a prescription for ACTIQ/FENTANYL in the name of ROBERT DZIEZYNSKI, a forged instrument or one which contained false information, in violation of A.R.S. § 13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801, a class 4 felony.

COUNT 11: FORGERY

On or about October 2, 2007, Defendant, ROBERT EDWARD DZIEZYNSKI, with intent to defraud, offered or presented to the APOTHECARY SHOP PHARMACY a prescription for ACTIQ/FENTANYL in the name of ANGELA DZIEZYNSKI, a forged instrument or one which contained false information, in violation of A.R.S. § 13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801, a class 4 felony.

COUNT 12: FORGERY

On or about October 26, 2007, Defendant, ROBERT EDWARD DZIEZYNSKI, with intent to defraud, offered or presented to WALGREEN'S PHARMACY a prescription for ACTIQ/FENTANYL in the name of FRED DZIEZYNSKI, a forged instrument or one which contained false information, in violation of A.R.S. § 13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801, a class 4 felony.

COUNT 13: FORGERY

On or about November 8, 2007, Defendant, ROBERT EDWARD DZIEZYNSKI, with intent to defraud, offered or presented to TARGET PHARMACY a prescription for ACTIQ/FENTANYL in the name of ROBERT DZIEZYNSKI, a forged instrument or one which contained false information, in violation of A.R.S. § 13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801, a class 4 felony.

COUNT 14: FORGERY


On or about December 14, 2007, Defendant, ROBERT EDWARD DZIEZYNSKI, with intent to defraud, offered or presented to WALGREEN'S PHARMACY a prescription for ACTIQ/FENTANYL in the name of AMANDA SCHLICHTING, a forged instrument or one which contained false information, in violation of A.R.S. § 13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801, a class 4 felony.

COUNT 15: FORGERY

On or about June 7, 2008, Defendant, ROBERT EDWARD DZIEZYNSKI, with intent to defraud, offered or presented to WALGREEN'S PHARMACY a prescription for ACTIQ/FENTANYL in the name of FRED DZIEZYNSKI, a forged instrument or one which contained false information, in violation of A.R.S. § 13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801, a class 4 felony.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

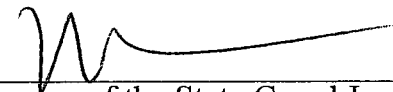
TERRY GODDARD
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STATE OF ARIZONA


BEVERLY J. RUDNICK
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A True Bill
(A "True Bill")

Dated: 8/12/2008


Foreperson of the State Grand Jury